IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v. : CRIMINAL NO.

14-574-PBT-01, 02, 03

DEVOS LTD. D/B/A GUARANTEED

RETURNS,

DEAN VOLKES,

DONNA FALLON

UNITED STATES' MOTION TO SEAL

The United States of America, by and through its attorneys, Zane David Memeger, United States Attorney, Nancy Rue, and Patrick J. Murray, Assistant United States Attorneys, in and for the Eastern District of Pennsylvania, respectfully moves for an Order sealing the United States' Response to Defendants' Motion Alleging Improprieties in the Use of Grand Jury Subpoenas (the "Response"). The Response discusses grand jury testimony and a grand jury investigation. Defendants' Motion and Memorandum of Law In Support were also filed under seal.

Respectfully submitted,

ZANE DAVID MEMEGER United States Attorney

/s/ Nancy Rue

Patrick J. Murray

Nancy Rue

Assistant United States Attorneys

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DONNA FALLON

ORDER

AND NOW, this ____ day of December, 2015, it is hereby

ORDERED that the United States' Response to Defendants' Motion Alleging

Improprieties in the Use of Grand Jury Subpoenas is GRANTED. It is ordered that the

United States' Response to Defendants' Motion Alleging Improprieties in the Use of

Grand Jury Subpoenas is filed under SEAL and that it remain under seal under further

order of the Court.

BY THE COURT:
HONODADI E DETDEGE D. THOWED
HONORABLE PETRESE B. TUCKER
Chief Judge, United States District Court

CERTIFICATE OF SERVICE

I certify that the foregoing United States' Motion To Seal Its Response to

Defendants' Motion was served by the Electronic Court Filing System on all counsel of record.

/s/Nancy Rue

Nancy Rue

Assistant United States Attorney